

Subj: File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

AUG 3 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**MEMORANDUM**

**SUBJECT:** Picloram: List A Reregistration Case No. 0096:  
Chemical No. 005102: DowElanco Submission of Water  
Solubility Data for the TIPA Salt: CBRS No. 14087:  
DP Barcode D205779: MRID No. 43307401.

**FROM:** William O. Smith, Chemist *William O. Smith*  
Reregistration Section I  
Chemistry Branch II-Reregistration Support (CBRS)  
Health Effects Division (7509C)

**THROUGH:** Paula A. Deschamp, Section Head *PA Deschamp*  
Reregistration Section I  
Chemistry Branch II-Reregistration Support  
Health Effects Division (7509C)

**TO:** Venus Eagle-Kunst / Walter Waldrop  
Reregistration Branch  
Special Review & Reregistration Division (7508W)

The registrant has submitted data concerning the solubility of the triisopropanolamine (TIPA) salt of picloram in water.

Picloram, TIPA salt (96.7% purity) was equilibrated in HPLC grade water at 20 C. Solutions were analyzed for picloram by reverse phase HPLC using a UV detector. Picloram, TIPA salt is very water soluble. The solubility was reported as > 85.8 g/100 ml.

**CBRS CONCLUSION**

The present submission and previously reviewed data (F. Toghrol; 4/1/94; DP Barcode D197439) satisfy the reregistration data requirements concerning the solubility (Guideline 63-8) of the picloram, TIPA salt TGAI.

cc: W. Smith, Picloram Reg. Std. File, SF, RF.

7509C:CB-II:WOS:wos:Rm805A:CM#2:X5353:07/28/94

TDI: PDeschamp(07/28/94) MMetzger(07/28/94) EZager(07/29/94)



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber